

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Richard A. Marshack, Trustee MARSHACK HAYS LLP 870 Roosevelt Irvine, CA 92620 949 333-7777 949 333-7778 FAX E-Mail: rmarshack@marshackhays.com <input checked="" type="checkbox"/> <i>Movant(s) appearing without an attorney</i> <input type="checkbox"/> <i>Attorney for Movant(s)</i>	FOR COURT USE ONLY			
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION				
In re: THE LITIGATION PRACTICE GROUP P.C., Debtor(s).	<table border="1"><tr><td>CASE NO.: 8:23-bk-10571-SC CHAPTER: 11</td></tr><tr><td style="text-align: center;">DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION LBR 9013-1(o)(3)</td></tr><tr><td style="text-align: center;">[No Hearing Required]</td></tr></table>	CASE NO.: 8:23-bk-10571-SC CHAPTER: 11	DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION LBR 9013-1(o)(3)	[No Hearing Required]
CASE NO.: 8:23-bk-10571-SC CHAPTER: 11				
DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION LBR 9013-1(o)(3)				
[No Hearing Required]				

1. I am the ☒ Movant(s) or ☐ attorney for Movant(s) or ☐ employed by attorney for Movant(s).
2. On (date): 06/07/2023 Movant(s) filed a motion or application (Motion) entitled: Trustee's Application to Employ Field Agent and Forensic Analyst [DK. 86]
3. A copy of the Motion and notice of motion is attached to this declaration.
4. On (date): 06/07/2023 Movant(s), served a copy of ☐ the notice of motion or ☒ the Motion and notice of motion on required parties using the method(s) identified on the Proof of Service of the notice of motion.
5. Pursuant to LBR 9013-1(o), the notice of motion provides that the deadline to file and serve a written response and request for a hearing is 14 days after the date of service of the notice of motion, plus 3 additional days if served by mail, or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F).
6. More than 17 days have passed after Movant(s) served the notice of motion.
7. I checked the docket for this bankruptcy case and/or adversary proceeding, and no response and request for hearing was timely filed.
8. No response and request for hearing was timely served on Movant(s) via Notice of Electronic Filing, or at the street address, email address, or facsimile number specified in the notice of motion.

9. Based on the foregoing, and pursuant to LBR 9013-1(o), a hearing is not required.

Movant(s) requests that the court grant the motion and enter an order without a hearing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: 06/27/2023

/s/ Richard A. Marshack
Signature

Richard A. Marshack
Printed name

EXHIBIT 1

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com
2 LAILA MASUD, #311731
lmasud@marshackhays.com
3 MARSHACK HAYS LLP
870 Roosevelt
4 Irvine, California 92620
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6 Attorneys for Chapter 11 Trustee
RICHARD A. MARSHACK
7

8 UNITED STATES BANKRUPTCY COURT
9 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION
10

11 In re
12 THE LITIGATION PRACTICE GROUP P.C.,
13
14 Debtor.
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Case No: 8-23-bk-10571-SC

Chapter 11

APPLICATION BY CHAPTER 7 TRUSTEE
TO EMPLOY BICHER & ASSOCIATES
AS THE ESTATE’S FIELD AGENT AND
FORENSIC ANALYST; DECLARATION
OF LORI J. ENSLEY IN SUPPORT

[NO HEARING REQUIRED PURSUANT
TO RULE 9013-1(O) OF THE LOCAL
BANKRUPTCY RULES]

20 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,
21 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

22 Richard A. Marshack, in his capacity as Chapter 11 Trustee (“Trustee”) of the Bankruptcy
23 Estate (“Estate”) of The Litigation Practice Group P.C. (“Debtor”), respectfully submits this
24 application (“Application”) for entry of an order authorizing the employment of Bicher & Associates
25 (“Bicher” or the “Firm”) as the Trustee’s and the Estate’s field agent and forensic analyst in this case
26 pursuant to 11 U.S.C. §§ 327 & 330 effective May 8, 2023.

27 In support of this Application, the Trustee respectfully represents as follows:
28

1 **1. Statement of Facts**

2 **A. Background Information**

3 On March 20, 2023, The Litigation Practice Group (“Debtor”) filed a voluntary petition
4 under Chapter 11 of Title 11 of the United States Code, initiating bankruptcy Case No. 8:23-bk-
5 10571-SC in the United States Bankruptcy Court for the Central District of California, Santa Ana
6 Division.

7 On March 30, 2023, as Dk. No. 21, the United States Trustee filed a motion to dismiss or
8 convert the case under 11 U.S.C. § 1112(b) for failure to comply with the U.S. Trustee guidelines
9 and requirements for a chapter 11 case. No opposition to the motion was filed.

10 On May 3, 2023, a hearing was held on the motion to dismiss or convert. At the hearing, the
11 Court directed the U.S. Trustee to appointment a Chapter 11 Trustee in this case. Richard A.
12 Marshack was appointed as the Chapter 11 trustee of the Debtor’s estate.

13 Trustee requires the assistance of the Firm to assist Trustee with, among other tasks, all
14 aspects of Trustee’s case administration including assisting all employed professionals and, if
15 requested, to undertake analysis of books and records and prepare reports, including the
16 investigation of avoidable transfers.

17 **i. Necessity of Field Agent and Possible Forensic Accounting**

18 The Trustee requires the assistance of the Firm to assist with:

- 19 • Determine sources of recovery for estate including analyzing accounts receivable
20 balances, avoidable transfers, insider transactions, preference actions and other potential claims by
21 analyzing Debtor’s books and records and source information;
- 22 • Perform solvency analysis to determine when the Debtor became insolvent;
- 23 • Provide litigation support as requested;
- 24 • Support the Trustee and Trustee’s professionals’ efforts to maximize recovery for
25 creditors through financial and other analysis; and
- 26 • Any other services mutually agreed upon by the Trustee and Bicher.
- 27
- 28

2. **Requirements for Application to Employ Professional**

Pursuant to Rule 2014 of the Federal Rules of Bankruptcy Procedure (“FRBP”) and Rule 2014-1 of the Local Bankruptcy Rules (“LBR”), there follows a summary of the proposed employment of the Firm. Should the Office of the United States Trustee, the Court, or any party in interest request additional information, the Firm will provide a supplemental declaration prior to any hearing on this Application.

ii. **LBR 2014-1(b)(1)(A) and LBR 2014-1(b)(3)(B) Employment and Compensation**

Pursuant to LBR 2014-1(b)(1)(A), “[a]n application seeking approval of employment of a professional person pursuant to 11 U.S.C. §§ 327, 328, 1103(a), or 1114 must comply with the requirements of FRBP 2014 and 6003(a) and be filed with the court. The application must specify unambiguously whether the professional seeks compensation pursuant to 11 U.S.C. § 328 or 11 U.S.C. § 330.”

Pursuant to LBR 2014-1(b)(3)(B), the Notice of the Application must also “[s]tate whether the professional seeks compensation pursuant to 11 U.S.C. § 328 or 11 U.S.C. § 330.”

The Trustee seeks employment the Firm pursuant to 11 U.S.C. §327. The Firm will seek compensation pursuant to 11 U.S.C. §§330 and 331.

iii. **FRBP 2014**

Rule 2014(a) of the Federal Rules of Bankruptcy Procedure provides as follows:

An order approving the employment of attorneys, accountants, appraisers, auctioneers, agents, or other professionals pursuant to § 327, § 1103, or § 1114 of the Code shall be made only on application of the trustee or committee. The application shall be filed and, unless the case is a chapter 9 municipality case, a copy of the application shall be transmitted by the applicant to the United States Trustee. The application shall state the specific facts showing the necessity for the employment, the name of the person to be employed, the reasons for the selection, the professional services to be rendered, any proposed arrangement for compensation, and, to the best of the applicant’s knowledge, all of the person’s connections with the debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee. The application shall be accompanied by a verified statement of the person to be employed setting forth the person’s connections with the debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.

1 The Trustee is seeking employment of the Firm. A copy of this Application will be served on
2 the Office of the United States Trustee.

3 a. **FRBP 2014 and LBR 2014-1(b)(3)(A) - Name of the**
4 **Person to Be Employed**

5 In addition to the provisions of Rule 2014 of the FRBP, LBR 2014-1(b)(3)(A) provides that
6 the Notice of the Application must “[s]tate the identity of the professional and the purpose and scope
7 for which it is being employed.”

8 The Trustee seeks to employ Bicher & Associates. The professionals who may render
9 services in connection with the Firm’s representation of the Estate are identified in the Firm’s billing
10 detail, to be submitted with each application for allowance of fees and reimbursement of costs, by
11 their initials. Those persons are Robert F. Bicher and Lori J. Ensley.

12 b. **FRBP 2014 and LBR 2014-1(b)(3)(A) - Reasons for the**
13 **Selection**

14 Trustee believes that the Firm is well-qualified to render the requested professional services
15 to the Estate. The Firm comprises professionals who have extensive experience in insolvency,
16 bankruptcy, and corporate reorganization. The Firm is experienced in debtor/creditor matters,
17 including the representation of trustees in bankruptcy cases. The members of the Firm have over 30
18 years of practice.

19 A biography of each professional of the Firm and a list of the current hourly billing rates is
20 attached as Exhibit “1” to the Declaration of Lori J. Ensley (“Ensley Declaration”).

21 c. **FRBP 2014 and LBR 2014-1(b)(3)(C) - Proposed**
22 **Arrangement Compensation**

23 In addition to the provisions of Rule 2014 of the Federal Rules of Bankruptcy Procedure,
24 LBR 2014-1(b)(3)(C) provides that the Notice of the Application must “[d]escribe the arrangements
25 for compensation, including the hourly rate of each professional to render services, source of the
26 fees, the source and amount of any retainer, the date on which it was paid, and any provision
27 regarding replenishment thereof[.]”
28

1 The Firm will render services to Trustee at the Firm's regular hourly rates, which may be
2 adjusted from time to time. Ms. Ensley's current hourly billing rate is \$110 for field agent services
3 and her rate for professional and/or forensic rates is \$230. Mr. Bicher's typical forensic accounting
4 rate is \$320 per hour, he has also agreed to lower his hourly rate to \$270 per hour to represent the
5 Estate in this case.

6 The Firm will be compensated from assets of the Estate, if any, and will not be compensated
7 absent the Estate's receipt or recovery of such assets. The Firm has received no retainer for the
8 services to be performed in this case and has agreed that no retainer will be paid.

9 The Firm will bill local travel expenses at the IRS mileage rate, currently 65.5 cents per mile,
10 or 1 hour round trip at the prevailing agent rate, whichever is greater, plus any parking or other
11 related expenses. Travel on weekends or holidays will be billed at the prevailing agent rate. The
12 Firm will pay any toll road costs incurred and will not seek reimbursement for such expenses.

13 Subject to 11 U.S.C. § 327(a), the Trustee requests that the Court approve a procedure where,
14 as the Estate receives available unencumbered cash, Trustee is authorized to pay up to 80% of the
15 invoiced field agent services and 100% of invoiced expenses, to the Firm on a monthly basis, with
16 final approval of such compensation and reimbursement of costs to be determined upon noticed
17 applications and approval by the Court pursuant to 11 U.S.C. § 330 and 331.

18 The Firm understands that its compensation in this case is subject to approval by the
19 Bankruptcy Court. In compliance with 11 U.S.C. §§ 330 and 331, the Firm intends to file interim
20 and final applications for allowance of fees and reimbursement of costs as and when appropriate for
21 any professional and/or forensic services. The Firm has advised Trustee that the Firm has not shared
22 or agreed to share any compensation to be received by it in this case with any other person, except as
23 among partners of the Firm.

24 **d. FRBP 2014 - Firm's Connections and Associations**

25 Except as disclosed herein and to the best of the Firm's knowledge, neither the Firm, nor any
26 of the employees or professionals comprising or employed by it, has any connection with Debtor or
27 Debtor's attorneys or accountants, Debtor's creditors, or any other party in interest, or their
28 respective attorneys or accountants.

1 Based on the foregoing, Trustee believes that the Firm is a “disinterested person” within the
2 meaning of Bankruptcy Code § 101(14).

3 The Firm does not have an interest adverse to the Debtor or the bankruptcy Estate. As of the
4 Petition Date, the Firm was not a creditor of the Estate and was not owed any funds by Debtor.

5 To the best of the Firm’s knowledge, and as set forth in the attached Ensley Declaration,
6 none of the professionals comprising or employed by the Firm have any connection with any judge
7 of the United States Bankruptcy Court for the Central District of California, the United States
8 Trustee, or any person currently employed in the Office of the United States Trustee.

9 **iv. LBR 2014-1(b)(1)(B) – Disinterestedness of the Firm**

10 Pursuant to LBR 2014-1(b)(1)(B), “The application must be accompanied by a declaration of
11 the person to be employed establishing disinterestedness or disclosing the nature of any interest held
12 by such person.” The Ensley Declaration submitted with this Application provides information
13 establishing the Firm’s disinterestedness.

14 **v. LBR 2014-1(b)(1)(C) – Service on Office of the United States**
15 **Trustee**

16 Pursuant to LBR 2014-1(b)(1)(C), “The United States Trustee must be served, in accordance
17 with LBR 2002-2(a), with a copy of the application and supporting declaration not later than the day
18 it is filed with the court. No hearing is required unless requested by the United States trustee or a
19 party in interest, or as otherwise ordered by the court.” As set forth in the sworn Proof of Service
20 filed contemporaneously with this document, a copy of this Application will be served on the Office
21 of the United States Trustee on the date this Application was filed with the Court.

22 **3. Conclusion**

23 For the foregoing, Trustee requests the Court enter an order:

- 24 1. Approving the Trustee’s Application;
- 25 2. Authorizing Trustee to employ the Firm as its field agent pursuant to 11 U.S.C. § 327
- 26 at the Firm’s hourly rates with any compensation and reimbursement of costs to be paid by the
- 27 Estate on a monthly basis pursuant to the procedure described above, subject to final approval of the
- 28 Court upon application to the Court pursuant to 11 U.S.C. §§ 330 and 331; and

3. For any such other and further relief as the Court deems just and proper.

DATED: June 1, 2023

By 

RICHARD A. MARSHACK
Chapter 7 Trustee

MARSHACK HAYS LLP

DATED: June 1, 2023

By: /s/ Laila Masud

D. EDWARD HAYS
LAILA MASUD
Attorneys for Chapter 7 Trustee
RICHARD A. MARSHACK

Declaration of Lori J. Ensley

I, LORI J. ENSLEY, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.
2. I am a Principal with Bicher & Associates, the Trustee's proposed field agent in this case.
3. I make this Declaration in support of the Application to Employ Bicher & Associates as the Estate's field agent ("Application") filed by Richard A. Marshack, Chapter 11 Trustee ("Trustee") for the bankruptcy estate ("Estate") The Litigation Practice Group P.C. ("Debtor").
4. If called as a witness, I could and would competently testify to the following of my own personal knowledge.
5. Trustee has asked that the Firm serve as Trustee's and the Estate's field agent in connection with the investigation of assets, solvency and administration of assets of the Estate. The Firm is well-qualified to do so.
6. The Firm is well-qualified to serve as the Trustee's field agent and forensic analyst in this case. I and the Firm have been involved in dozens of prior bankruptcy cases and served as a field agent for bankruptcy trustees for over three decades, and provided valuable assistance and analysis in connection with dozens of prior bankruptcy cases. The members of the Firm have over 30 years of experience in the areas of corporate restructuring, financial analysis and forensic accounting, specifically with an emphasis on bankruptcy-specific issues.
7. Trustee requested the assistance of the Firm to:
 - Determine sources of recovery for estate including analyzing accounts receivable balances, avoidable transfers, insider transactions, preference actions and other potential claims by analyzing Debtor's books and records and source information;
 - Perform solvency analyses to determine when the Debtor became insolvent;
 - Provide litigation support as requested;
 - Support the Trustee and Trustee's professionals' efforts to maximize recovery for creditors through financial and other analysis; and

1 • Any other services mutually agreed upon by the Trustee and Bicher.

2 8. A biography of each professional of the Firm with billing rates is attached as Exhibit
3 “1” and incorporated by this reference.

4 9. My current hourly billing rate is \$110 for field agent services and my rate for
5 professional and/or forensic rate is \$230. While Mr. Bicher’s typical forensic accounting rate is \$320
6 per hour and he has agreed to lower his hourly rate to \$270 per hour to represent the Estate in this
7 case.

8 10. The Firm has not received a retainer for the services that it will perform in this matter.

9 11. The Firm understands that its compensation in this case is subject to approval of this
10 Court pursuant to 11 U.S.C. §§ 327, 330, and 331.

11 12. The Firm requests authorization for the Trustee to pay up to 80% of the invoiced field
12 agent services and 100% of invoiced expenses, to the Firm on a monthly basis, with interim and final
13 approval of such compensation and reimbursement of costs to be determined upon noticed
14 applications and approval by the Court pursuant to 11 U.S.C. § 330 and 331.

15 13. The Firm has not shared or agreed to share any compensation to be received by it in
16 the case with any other person, except as among partners of the Firm.

17 14. The Firm completed a conflicts check prior to submitting this Application.

18 15. To the best of my knowledge, neither the Firm, nor any of the attorneys comprising or
19 employed by it, has any connection with Debtor or Debtor’s attorneys or accountants, Debtor’s
20 creditors, or any other outside party in interest, or their respective attorneys or accountants.

21 16. The Firm is not and was not an investment banker for any outstanding security of the
22 Debtor.

23 17. The Firm has not been within three (3) years before the date of the filing of the
24 petition herein, an investment banker for a security of Debtor, or an attorney for such an investment
25 banker in connection with the offer, sale or issuance of any security of Debtor.

26 18. The Firm is not and was not, within two (2) years before the date of the filing of
27 Debtor’s petition, a director, officer or employee of the Debtor or of any investment banker for any
28 security of Debtor.

19. As of the Petition Date, the Firm was not a creditor of the Estate, an equity security holder, or an insider of Debtor. The Firm has no pre-petition claim against Debtor's Estate and was not owed any funds by Debtor.

20. The Firm neither holds nor represents any interest materially adverse to the interest of the Estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, Debtor or an investment banker for any security of Debtor, or for any other reason.

21. To the best of my knowledge, none of the persons employed by the Firm have any connection to any judge of the United States Bankruptcy Court for the Central District of California, the United States Trustee, or any person currently employed in the Office of the United States Trustee, except that the Firm has previously served as field agent to Richard A. Marshack, the Trustee in this case, in connection with other, unrelated bankruptcy cases.

22. The Firm does not have an interest adverse to Debtor or the bankruptcy Estate.

23. Based on the foregoing, I believe that the Firm is a “disinterested person” within the meaning of 11 U.S.C. § 101(14).

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 3rd, 2023.

Lori J. Ensley
LORI J. ENSLEY

EXHIBIT 1

ROBERT F. BICHER III

EDUCATION: Graduated Phi Beta Kappa with High Honors in 1975 from the University of California Riverside with a Bachelor of Science of Administrative Sciences, specializing in finance and accounting, and from the Graduate School of Administration (now known as the Graduate School of Management) of the University of California Riverside in 1978 with a Masters of Administration in Business Administration, specializing in finance.

EXPERIENCE: Mr. Bicher's experience includes: three years as a financial consultant for investment management firms; five years as a full-time faculty member at California State University San Bernardino, teaching graduate and undergraduate finance and marketing; four years with the Office of the United States Trustee as Senior Bankruptcy Analyst, administering over 3,000 Chapter 11 cases; and thirty-five years performing financial consulting and turnaround management services as Interim CEO/President, Liquidating Agent, Disbursing Agent, Claims Agent/Administrator, Forensic Accounting, and Court ordered Examiner for financially distressed companies, Trustees, Receivers, and Chapter 11 Debtors. Mr. Bicher has directly managed and controlled various types of operations including, but not limited to, manufacturing, retail, medical practices, advertising, real estate, mortgage, and service businesses.

LORI J. ENSLEY

EDUCATION: Graduated in 1983 from the University of California Los Angeles with a Bachelor of Arts in English and minor in Economics.

EXPERIENCE: Ms. Ensley's experience includes nine years of accounting experience as a staff accountant, cost analyst, and controller for various companies; three years as director of operations for a manufacturing and advertising firm; and thirty-one years as a financial/turnaround management consultant with Robert F. Bicher & Associates. Ms. Ensley has overseen a variety of business operations including, but not limited to, manufacturing, retail, medical practices, advertising, real estate, mortgage, and service businesses. In addition, Ms. Ensley has assisted numerous Chapter 11 Debtors with United States Trustee Compliance Requirements and provided services for Chapter 11 and 7 Trustees in Southern California, including Operations, Forensic Accounting, and Preference and Claims Analysis.

REFERENCES:

JEFFREY W. BROKER, ESQ. (949) 222-2000
BROKER & ASSOCIATES

ALAN J. FRIEDMAN, ESQ. (949) 340-3400
SHULMAN BASTIAN FRIEDMAN & BUI

RICHARD A. MARSHACK, ESQ. (949) 333-7777
MARSHACK HAYS, LLP

DAVID WOOD, ESQ. (949) 333-7777
MARSHACK HAYS, LLP

NANETTE D. SANDERS, ESQ. (949) 851-7450
RINGSTAD & SANDERS

TODD C. RINGSTAD, ESQ. (949) 851-7450
RINGSTAD & SANDERS

LEONARD M. SHULMAN, ESQ. (949) 340-3400
SHULMAN BASTIAN FRIEDMAN & BUI

LYNDA T. BUI, ESQ. (949) 340-3400
SHULMAN BASTIAN FRIEDMAN & BUI

SAM LESLIE, CPA (323) 987-5780
LEA ACCOUNTANCY

MARC C. FORSYTHE, ESQ. (949) 798-2467
GOE FORSYTHE & HODGES

CAROLINE DJANG (949) 224-6252
BUCHALTER

Current Billing Rates

Professional Services:

Robert F. Bicher \$ 320.00/Hour

Lori J. Ensley \$ 230.00/Hour

Agent Services:

Robert F. Bicher \$ 110.00/Hour

Lori J. Ensley \$ 110.00/Hour

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **APPLICATION BY CHAPTER 11 TRUSTEE TO EMPLOY BICHER & ASSOCIATES AS AGENT AND ANALYST; DECLARATION OF LORI ENSLEY IN SUPPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **June 6, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On __, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**MAIL REDIRECTED TO TRUSTEE
DEBTOR**

THE LITIGATION PRACTICE GROUP P.C.
17542 17TH ST
SUITE 100
TUSTIN, CA 92780-1984

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on __, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service on Judge not required pursuant to LBR 5005-2(d)

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 7, 2023 Pamela Kraus
Date Printed Name

/s/ Pamela Kraus
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): continued:

- **ATTORNEY FOR CREDITOR SDCO TUSTIN EXECUTIVE CENTER, INC.:** Ronald K Brown
ron@rkbrownlaw.com
- **INTERESTED PARTY COURTESY NEF:** Shawn M Christianson cmcintire@buchalter.com,
schristianson@buchalter.com
- **INTERESTED PARTY COURTESY NEF: Richard H Golubow** rgolubow@wghlawyers.com,
jmartinez@wghlawyers.com;svillegas@wghlawyers.com
- **ATTORNEY FOR TRUSTEE:** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com;
kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR CITY CAPITAL NY:** Alan Craig Hochheiser ahochheiser@mauricewutscher.com,
arodriguez@mauricewutscher.com
- **ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and
CREDITOR MC DVI FUND 2, LLC:** Garrick A Hollander ghollander@wghlawyers.com,
jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **ATTORNEY FOR DEBTOR THE LITIGATION PRACTICE GROUP P.C.:** Joon M Khang joon@khanglaw.com
- **INTERESTED PARTY COURTESY NEF: David S Kupetz** David.Kupetz@lockelord.com,
mylene.ruiz@lockelord.com
- **INTERESTED PARTY COURTESY NEF: Michael D Lieberman** mlieberman@lipsonneilson.com
- **CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR):** Richard A Marshack (TR)
pkraus@marshackhays.com, rmarshack@iq7technology.com; ecf.alert+Marshack@titledxi.com
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- **INTERESTED PARTY COURTESY NEF:** Ronald N Richards ron@ronaldrichards.com,
7206828420@filings.docketbird.com
- **INTERESTED PARTY COURTESY NEF:** Paul R Shankman PShankman@fortislaw.com, info@fortislaw.com
- **US TRUSTEE:** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

EXHIBIT 2

1 D. EDWARD HAYS, #162507
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2 LAILA MASUD, #311731
lmasud@marshackhays.com
3 MARSHACK HAYS LLP
870 Roosevelt
4 Irvine, California 92620
Telephone: (949) 333-7777
5 Facsimile: (949) 333-7778

6 Attorneys for Chapter 11 Trustee
RICHARD A. MARSHACK

8 UNITED STATES BANKRUPTCY COURT
9 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

11 In re
12 THE LITIGATION PRACTICE GROUP P.C.,
13
14 Debtor.

Case No: 8:23-bk-10571-SC

Chapter 11

NOTICE OF APPLICATION BY
CHAPTER 7 TRUSTEE TO EMPLOY
BICHER & ASSOCIATES AS THE
ESTATE'S FIELD AGENT AND
FORENSIC ANALYST

17 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,
18 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

19 PLEASE TAKE NOTICE that Richard A. Marshack, in his capacity as Chapter 11 Trustee
20 (“Trustee”) of the Bankruptcy Estate (“Estate”) of The Litigation Practice Group P.C. (“Debtor”),
21 has filed an application (“Application”) for entry of an order authorizing the employment of Bicher
22 & Associates (“Bicher” or the “Firm”) as the Trustee’s and the Estate’s field agent and forensic
23 analyst in this case pursuant to 11 U.S.C. §§ 327 & 330 effective May 8, 2023.

24 The Trustee requires the assistance of the Firm to assist with:

- 25 • Determining sources of recovery for estate including analyzing accounts receivable
- 26 balances, avoidable transfers, insider transactions, preference actions and other potential claims by
- 27 analyzing Debtor’s books and records and source information;
- 28 • Performing solvency analysis to determine when the Debtor became insolvent;

- Providing litigation support as requested;
- Supporting the Trustee and Trustee's professionals' efforts to maximize recovery for creditors through financial and other analysis; and
- Any other services mutually agreed upon by the Trustee and Bicher.

The Firm will render services to Trustee at the Firm's regular hourly rates, which may be adjusted from time to time. Ms. Ensley's current hourly billing rate is \$110 for field agent services and her rate for professional and/or forensic rates is \$230. Mr. Bicher's typical forensic accounting rate is \$320 per hour, he has also agreed to lower his hourly rate to \$270 per hour to represent the Estate in this case.

The Firm will be compensated from assets of the Estate, if any, and will not be compensated absent the Estate's receipt or recovery of such assets. The Firm has received no retainer for the services to be performed in this case and has agreed that no retainer will be paid.

The Firm will bill local travel expenses at the IRS mileage rate, currently 65.5 cents per mile, or 1 hour round trip at the prevailing agent rate, whichever is greater, plus any parking or other related expenses. Travel on weekends or holidays will be billed at the prevailing agent rate. The Firm will pay any toll road costs incurred and will not seek reimbursement for such expenses.

Subject to 11 U.S.C. § 327(a), the Trustee requests that the Court approve a procedure where, as the Estate receives available unencumbered cash, Trustee is authorized to pay up to 80% of the invoiced field agent services and 100% of invoiced expenses, to the Firm on a monthly basis, with final approval of such compensation and reimbursement of costs to be determined upon noticed applications and approval by the Court pursuant to 11 U.S.C. § 330 and 331.

The Firm understands that its compensation in this case is subject to approval by the Bankruptcy Court. In compliance with 11 U.S.C. §§ 330 and 331, the Firm intends to file interim and final applications for allowance of fees and reimbursement of costs as and when appropriate.

The Firm has advised Trustee that the Firm has not shared or agreed to share any compensation to be received by it in this case with any other person, except as among partners of the Firm.

1 The complete scope and terms of the employment are detailed in the Application a copy of
2 which can be obtained by contacting Laila Masud at the address indicated above.

3 **PLEASE TAKE FURTHER NOTICE** that any response and request for hearing as to the
4 proposed employment must be in the form as required by Local Bankruptcy Rules 2014-1(b), 9013-
5 1(f) and (o) and filed with the Clerk of the above-entitled Court. The deadline for any response and
6 request for hearing is 14 days after the date of service of this Notice, plus an additional 3 days unless
7 this Notice was served by personal delivery or posting as described in F.R.Civ.P. 5(b)(2)(A)-(B). A
8 copy of any response or request for hearing must be served on D. Edward Hays and Laila Masud at
9 the address indicated above. A copy must also be served on the Office of the United States Trustee,
10 411 W. Fourth Street, Suite 7160, Santa Ana, California 92701. Failure to timely respond may be
11 deemed as acceptance of the proposed relief. See Local Bankruptcy Rules 9013-1(h).

12
13 DATED: June 6, 2023

MARSHACK HAYS LLP

14
15 By: /s/ Laila Masud
16 D. EDWARD HAYS
17 LAILA MASUD
18 Attorneys for Chapter 7 Trustee
19 RICHARD A. MARSHACK
20
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23
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25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled (specify): **NOTICE OF TRUSTEE'S APPLICATION TO EMPLOY BICHER & ASSOCIATES** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **June 6, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On **June 7, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on __, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service on Judge not required pursuant to LBR 5005-2(d)

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 7, 2023 Pamela Kraus
Date Printed Name

/s/ Pamela Kraus
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** continued:

- **ATTORNEY FOR CREDITOR SDCO TUSTIN EXECUTIVE CENTER, INC.:** Ronald K Brown
ron@rkbrownlaw.com
- **INTERESTED PARTY COURTESY NEF:** Shawn M Christianson cmcintire@buchalter.com,
schristianson@buchalter.com
- **INTERESTED PARTY COURTESY NEF: Richard H Golubow** rgolubow@wghlawyers.com,
jmartinez@wghlawyers.com;svillegas@wghlawyers.com
- **ATTORNEY FOR TRUSTEE:** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com;
kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR CITY CAPITAL NY:** Alan Craig Hochheiser ahochheiser@mauricewutscher.com,
arodriguez@mauricewutscher.com
- **ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and
CREDITOR MC DVI FUND 2, LLC:** Garrick A Hollander ghollander@wghlawyers.com,
jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **ATTORNEY FOR DEBTOR THE LITIGATION PRACTICE GROUP P.C.:** Joon M Khang joon@khanglaw.com
- **INTERESTED PARTY COURTESY NEF: David S Kupetz** David.Kupetz@lockelord.com,
mylene.ruiz@lockelord.com
- **INTERESTED PARTY COURTESY NEF: Michael D Lieberman** mlieberman@lipsonneilson.com
- **CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR):** Richard A Marshack (TR)
pkraus@marshackhays.com, rmarshack@iq7technology.com; ecf.alert+Marshack@titledxi.com
- **ATTORNEY FOR TRUSTEE:** Laila Masud lmasud@marshackhays.com, lmasud@ecf.courtdrive.com;
kfrederick@ecf.courtdrive.com
- **INTERESTED PARTY COURTESY NEF:** Byron Z Moldo bmoldo@ecjlaw.com, amatsuoka@ecjlaw.com,
dperez@ecjlaw.com
- **INTERESTED PARTY COURTESY NEF:** Alan I Nahmias anahmias@mbn.law, jdale@mbnlawyers.com
- **ATTORNEY FOR US TRUSTEE:** Queenie K Ng queenie.k.ng@usdoj.gov
- **INTERESTED PARTY COURTESY NEF:** Ronald N Richards ron@ronaldrichards.com,
7206828420@filings.docketbird.com
- **INTERESTED PARTY COURTESY NEF:** Paul R Shankman PShankman@fortislaw.com, info@fortislaw.com
- **US TRUSTEE:** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

2. **SERVED BY UNITED STATES MAIL:** continued:

**MAIL REDIRECTED TO TRUSTEE
DEBTOR**

THE LITIGATION PRACTICE
GROUP P.C.
47542 47TH ST
SUITE 400
TUSTIN, CA 92780-4984

20 LARGEST CREDITOR

DOCUMENT FULFILLMENT SERVICES
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE OF PROCESS
2930 RAMONA AVE #100
SACRAMENTO, CA 95826-3838

20 LARGEST CREDITOR

TUSTIN EXECUTIVE CENTER
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
1630 S SUNKIST STEET
STE A
ANAHEIM, CA 92806-5816

20 LARGEST CREDITOR

TASKUS HOLDINGS, INC.
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
1650 INDEPENDENCE DR
NEW BRAUNFELS, TX 78132-3959

20 LARGEST CREDITOR

SHARP BUSINESS SYSTEMS
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE OF PROCESS
8670 ARGENT ST
SANTEE, CA 92071-4172

**20 LARGEST CREDITOR / POC
ADDRESS**

OUTSOURCE ACCELERATOR LTD
C/O PAUL R. SHANKMAN, ESQ
FORTIS LLP
650 TOWN CENTER DRIVE, SUITE
1530
COSTA MESA, CA 92626

20 LARGEST CREDITOR

NETSUITE-ORACLE
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
2300 ORACLE WAY
AUSTIN, TX 78741-1400

20 LARGEST CREDITOR

LEXISNEXUS
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
15500 B ROCKFIELD BLVD
IRVINE, CA 92618-2722

20 LARGEST CREDITOR

CREDIT REPORTING SERVICE
INC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
548 MARKET ST, SUITE 72907
SAN FRANCISCO, CA 94104-5401

20 LARGEST CREDITOR

BUSINESS CENTERS OF
AMERICA
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
1100 SIR FRANCIS DRAKE BLVD,
SUITE 1
KENTFIELD, CA 94904-1476

20 LARGEST CREDITOR

EXECUTIVE CENTER LLC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
5960 SOUTH JONES BLVD
LAS VEGAS, NV 89118-2610

20 LARGEST CREDITOR

MC DVI FUND 1, LLC; MC DVI FUND 2,
LLC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE OF PROCESS
1598 COTTONWOOD DR
GLENVIEW, IL 60026-7769

20 LARGEST CREDITOR

JP MORGAN CHASE
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE OF PROCESS
3 PARK PLAZA, STE 900
IRVINE, CA 92614-5208

20 LARGEST CREDITOR

ANTHEM BLUE CROSS
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE OF PROCESS
PO BOX 511300
LOS ANGELES, CA 90051-7855

**20 LARGEST CREDITOR / POC
ADDRESS**

EXELA ENTERPRISE SOLUTIONS
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE OF PROCESS
2701 E. GRAUWYLER ROAD
IRVING, TX 75061-3414

20 LARGEST CREDITOR

DEBT PAY PRO
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO RECEIVE
SERVICE OF PROCESS
1900 E GOLF ROAD, SUITE 550
SCHAUMBURG, IL 60173-5870

20 LARGEST CREDITOR

MARICH BEIN LLC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
99 WALL STREET
STE 2669
NEW YORK, NY 10005-4301

**20 LARGEST CREDITOR / POC
ADDRESS**

FIRST LEGAL NETWORK, LLC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
PO BOX 743451
LOS ANGELES, CA 90074-3451

20 LARGEST CREDITOR

AZEVEDO SOLUTIONS GROUPS,
INC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
420 ADOBE CANYON RD
KENWOOD, CA 95452-9048

20 LARGEST CREDITOR

COLLABORATION ADVISORS
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
400 DORLA COURT
ZEPHYR COVE, NV 89448

20 LARGEST CREDITOR

DEBT VALIDATION FUND II, LLC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
5075 LOWER VALLEY ROAD
ATGLEN, PA 19310-1774

20 LARGEST CREDITOR

VALIDATION PARTNERS LLC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
1300 SAWGRASS PKWY
STE 110
SUNRISE, FL 33323

20 LARGEST CREDITOR

CALIFORNIA FRANCHISE TAX BOARD
PO BOX 942857
SACRAMENTO, CA 94257-0001

20 LARGEST CREDITOR

LIBERTY MUTUAL
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
PO BOX 91013
CHICAGO, IL 60680-1171

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: **DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION [LBR 9013-1(o)(3)]** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 06/27/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

06/28/2023
Date

Pamela Kraus
Printed Name

/s/ Pamela Kraus
Signature

- **Eric Bensamochan** eric@eblawfirm.us, G63723@notify.cincompass.com
- **Ronald K Brown** ron@rkbrownlaw.com
- **Christopher Celentino** christopher.celentino@dinsmore.com, caron.burke@dinsmore.com
- **Shawn M Christianson** cmcintire@buchalter.com, schristianson@buchalter.com
- **Randall Baldwin Clark** rbc@randallbclark.com
- **Leslie A Cohen** leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com; clare@lesliecohenlaw.com
- **Christopher Ghio** christopher.ghio@dinsmore.com
- **Richard H Golubow** rgolubow@wghlawyers.com, jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmen
doza@ecf.courtdrive.com
- **Alan Craig Hochheiser** ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
- **Garrick A Hollander** ghollander@wghlawyers.com, jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **Joon M Khang** joon@khanglaw.com
- **Ira David Kharasch** ikharasch@pszjlaw.com
- **David S Kupetz** David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com
- **Christopher J Langley** chris@slclawoffice.com, omar@slclawoffice.com; langleycr75251@notify.bestcase.com; ec123@casedriver.com
- **Daniel A Lev** daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com; dlev@ecf.courtdrive.com
- **Michael D Lieberman** mlieberman@lipsonneilson.com
- **Richard A Marshack (TR)** pkraus@marshackhays.com, rmarshack@iq7technology.com; ecf.alert+Marshack@titlexi.com
- **Laila Masud** lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com
- **Kenneth Miskin** Kenneth.M.Miskin@usdoj.gov
- **Byron Z Moldo** bmoldo@ecjlaw.com, amatsuoka@ecjlaw.com; dperez@ecjlaw.com
- **Alan I Nahmias** anahmias@mbn.law, jdale@mbnlawyers.com
- **Victoria Newmark** vnewmark@pszjlaw.com
- **Queenie K Ng** queenie.k.ng@usdoj.gov
- **Teri T Pham** tpham@enensteinlaw.com, 3135.002@enensteinlaw.com
- **Douglas A Plazak** dplazak@rhlaw.com
- **Ronald N Richards** ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- **Gregory M Salvato** gsalvato@salvatoboufadel.com, calendar@salvatolawoffices.com; jboufadel@salvatoboufadel.com; gsalvato@ecf.inforuptcy.com
- **Olivia Scott** olivia.scott3@bclplaw.com
- **Jonathan Serrano** jonathan.serrano@dinsmore.com
- **Paul R Shankman** PShankman@fortislaw.com, info@fortislaw.com
- **Leslie Skorheim** leslie.skorheim@usdoj.gov
- **Andrew Still** astill@swlaw.com, kcollins@swlaw.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- **Sharon Z. Weiss** sharon.weiss@bclplaw.com, raul.morales@bclplaw.com; REC_KM_ECF_SMO@bclplaw.com
- **Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com; eweiman@wrslawyers.com